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Docket Management Facility (USCG-2006-2567)
U.S. Department of Transportation, Room PL-401, 400 SW
Washington, D.C. 20590-0001

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To Whom It May Concern:

Recently, the Ninth District Coast Guard has proposed establishing a series of live-fire zones throughout the Great Lakes, including four zones in Lake Erie and 3 in Lake Ontario. These zones, which cover 2.5% of the total water surface, would be in use several times per year. It is very important to provide the Coast Guard with training in use of weapons. However, there are several issues besides security that deserve consideration.

The Commander of the Ninth Coast Guard District himself has said, "We must protect this intricate Great Lakes' system that constitutes 25 percent of the planet's fresh water supply and provides a vital international maritime transportation link for the nation's agricultural and industrial heartland." Part of protecting the Great Lakes is assuring the safety of recreational users and conserving the water quality. There is much concern over the quantity of lead (from ammunition) that will enter the water during the training exercises. According to the Michigan Environmental Council, the amount of lead added to the water per year would approach 7000 pounds. To their credit, the Coast Guard has investigated environmental impacts, but it seems clear that more study is needed.

Other concerns center around safety and economic impacts: The Coast Guard proposes to warn boaters away from the area by broadcasting on a marine band radio channel; however, boats without radios and GPS and low-flying aircraft require warning as well; even one failure in communication could result in tragedy. Furthermore, the possibility of ammunition traveling outside of the safety zone needs consideration. Additionally, the training exercises are likely to decrease the desirability of the Great Lakes for recreation; this could have economic consequences.

Due to the above concerns, it is important not to allow the live-fire zones to be implemented as proposed. It is possible that some alternative training method could be found. Are three or more live-fire zones per lake really necessary? Perhaps less would suffice. Also, why not send the Coast Guard personnel to training areas that are already established?

I urge you to involve yourself in the decision making process and consider the concerns I have outlined above. I feel certain that the safety, environmental, and economic concerns can be resolved without compromising the readiness of the Coast Guard.

Thank you,

Brendan Epstein